

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**RALPH SMITH, individually and on behalf  
of all others similarly situated,**

**Plaintiff,**

**v.**

**STROM ENGINEERING CORPORATION,**

**Defendant.**

**CIVIL ACTION NO.: 2:19-cv-00147-  
MRH-RCM**

**CLASS ACTION**

**JOINT MOTION FOR ENTRY OF PROPOSED ORDER  
REGARDING THE SEARCH FOR AND PRODUCTION OF DISCOVERY MATERIAL**

Plaintiff Ralph Smith and Defendant Strom Engineering Corporation hereby jointly move the Court for entry of the Parties' Proposed Order Regarding the Search for and Production of Discovery Material.

In support of the motion the Parties state the following:

1. The Parties have determined that this case would benefit from a protocol for the search for and production of discovery material, including Electronically Stored Information ("ESI").

2. The Parties have agreed to a Proposed Order Regarding the Search for and Production of Discovery Material, and request that the Court enter the Order upon the agreed terms set forth therein.

WHEREFORE, the Parties respectfully move the Court for entry of the Parties' Proposed Order Regarding the Search for and Production of Discovery Material.

Dated: August 26, 2020

BERGER MONTAGUE P.C.

/s/ Sarah R. Schalman-Bergen

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*\*Pro hac vice* to be filed

*Counsel for Plaintiff*

Respectfully Submitted,

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